



61

September 8, 2000

Via E-Mail, Facsimile,  
and Regular Mail

Mr. Robert C. McNally  
Special Review Branch Chief  
Special Review and Reregistration Division  
Office of Pesticide Programs  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Mail Code 7508W  
Washington, D.C. 20460

Re: Dichlorvos

Dear Mr. McNally:

We write to inquire about the status of various items that are currently outstanding pertaining to dichlorvos. It would be very helpful if you could provide feedback on the following:

- Status of the label changes submitted for comment on April 6, 2000, and submitted for approval on August 14, 2000.
- Status of the review of the additional studies regarding the FQPA factor that were submitted on March 21, 2000, and on June 9, 2000. These submissions included a significant number of studies regarding developmental effects of dichlorvos in pigs that were not included in the report entitled "Dichlorvos (DDVP) - Reassessment Report of the FQPA Safety Factor Committee. Dated February 23, 2000." In this regard, we request a copy of any memorandum documenting any meeting of the FQPA Safety Factor Committee to review dichlorvos since the Committee's January 18, 2000, meeting.

Mr. Robert C. McNally  
September 8, 2000  
Page 2

- Status of the review of the list of errors provided to EPA on May 12, 2000, regarding the "Revised Preliminary HED Risk Assessment for Dichlorvos DP Barcode D238938, Dated April 5, 2000." If the risk assessment has been revised, we would like a copy to review.
- Status of the review of the comments provided to EPA on June 30, 2000, regarding the errors made in the selection of the rabbit developmental study as the endpoint for short-term dermal and inhalation risk assessment in the document entitled "Revised Preliminary HED Risk Assessment for Dichlorvos DP Barcode D238938, Dated April 5, 2000." The HIARC Committee report that was made available to us is dated June 10, 1999, and entitled "Dichlorvos (DDVP) -- REPLACEMENT OF HUMAN STUDY USED IN RISK ASSESSMENTS -- Report of the Hazard Identification Assessment Review Committee." If this committee has subsequently met to review DDVP, we request a copy of the memorandum documenting the meeting.

Amvac is committed to working with EPA in an expeditious manner to revise the labels for DDVP pest strips. Towards this end, we believe a meeting with EPA to discuss the technical rationale for the change in the product use would be beneficial.

Sincerely,

*Ian S. Chart*

Ian S. Chart  
Director of Regulatory Affairs

cc: Mr. Jack E. Housenger (via e-mail, facsimile, and regular mail)